

UNITED STATES OF AMERICA
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

00-90036
CRIMINAL NO. 31006
JUDGE MARILYNNE O. BATTAN
HON. MAGISTRATE JUDGE GOLDMAN

- ✓D-1 ^{AD} RILEY TROY GRAHAM, ^{DO-M-51006-1}
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B",
VIO: 21 U.S.C. §841
21 U.S.C. §846
21 U.S.C. §848
18 U.S.C. §2
18 U.S.C. §1513
18 U.S.C. §1956
- ✓D-2 LEON ALFRED SMITH, Jr.,
- ✓D-3 DAVID BARNETT,
a.k.a. "Dawoo",
- ✓D-4 SHANNON NEAL LEE,
a.k.a. "Darryl Rapley",
- D-5 OZRO GRAHAM,
a.k.a. "Rashawn Martin",
a.k.a. "Booby",
- D-6 GEORGE KINGSTON,
a.k.a. "G",
- D-7 DENNIS W. WILLIAMS, Jr.,
a.k.a. "William Hunter",
a.k.a. "Uncle",
- D-8 ALICIA NEWSOME,
a.k.a. "Dawneik Talley",
a.k.a. "Alicia Jackson",
- D-9 TOI HORN,
- D-10 BRYON JONES,
a.k.a. "Brian Simms",
- D-11 ELLIOTT BERRY BROWN,
a.k.a. "L",
- D-12 JULIA A. CARTER,
a.k.a. "Albertha Kelly",
a.k.a. "Jules",
- D-13 KELLY N. TERRELL,
- D-14 QUIANNA STARR WASLER,
a.k.a. "Kiki",

NO MAG. NO.

FILED
JUL 15 2003
U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

D-15 MICHAEL MOSELY,
D-16 DARRYL JAMES,
D-17 DARNELL JACKSON,
a.k.a. "Bruce Stewart",
a.k.a. "The Chemist",
D-18 KYLE STEVENS,
D-19 ALTHEA MARIE WILLIAMS, *Charge on* 00-80143-DT-1
a.k.a. "Althea M. Mckinzie",
a.k.a. "Mikki Mckinzie",
a.k.a. "Andrea Jacobs",
a.k.a. "Mikki" *OPEN*

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §846 - Conspiracy to Distribute Cocaine and Cocaine Base["Crack"])

D-1 RILEY TROY GRAHAM,
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B",
D-2 LEON ALFRED SMITH, Jr.,
D-3 DAVID BARNETT,
a.k.a. "Dawoo",
D-4 SHANNON NEAL LEE,
a.k.a. "Darryl Rapley",
D-5 OZRO GRAHAM,
a.k.a. "Rashawn Martin",
a.k.a. "Booby",
D-6 GEORGE KINGSTON,
a.k.a. "G",
D-7 DENNIS W. WILLIAMS, Jr.,
a.k.a. "William Hunter",
a.k.a. "Uncle",
D-8 ALICIA NEWSOME,

a.k.a. "Dawneik Talley",
 a.k.a. "Alicia Jackson",
 D-9 TOI HORN,
 D-10 BRYON JONES,
 a.k.a. "Brian Simms",
 D-11 ELLIOTT BERRY BROWN,
 a.k.a. "L",
 D-12 JULIA A. CARTER,
 a.k.a. "Albertha Kelly",
 a.k.a. "Jules",
 D-13 KELLY N. TERRELL,
 D-14 QUIANNA STARR WASLER,
 a.k.a. "Kiki",
 D-15 MICHAEL MOSELY,
 D-16 DARRYL JAMES,
 D-17 DARNELL JACKSON,
 a.k.a. "Bruce Stewart",
 a.k.a. "The Chemist",
 D-18 KYLE STEVENS,

That from in or about the year of 1991, said date(s) being approximate, and continuing thereafter up to and including the year of 1998, in the Eastern District of Michigan, Southern Division, and elsewhere, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", LEON ALFRED SMITH, Jr., DAVID BARNETT, a.k.a. "Dawoo", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", GEORGE KINGSTON, a.k.a. "G", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", TOI HORN, BRYON JONES, a.k.a. "Brian Simms", ELLIOTT BERRY BROWN, a.k.a. "L", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, QUIANNA STARR WASLER, a.k.a. "Kiki", MICHAEL MOSELY, DARRYL JAMES, DARNELL JACKSON, a.k.a. "Bruce Stewart", a.k.a. "The Chemist", and KYLE STEVENS, defendants herein, did knowingly, intentionally and unlawfully combine, conspire, confederate and

agree with various other persons whose names are both known and unknown to the Grand Jury to commit offenses against the United States, that is to possess with the intent to distribute and distribute 5 kilograms or more of a mixture or substance containing a detectable amount of Cocaine, and possess with the intent to distribute and distribute 50 grams or more of a mixture or substance containing a detectable amount of Cocaine Base ("Crack"), Schedule II Controlled Substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 846.

It was part of the ways and means of this unlawful conspiracy that RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", and others would supply quantities of drugs to LEON ALFRED SMITH, Jr., DAVID BARNETT, a.k.a. "Dawoo", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", GEORGE KINGSTON, a.k.a. "G", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", BRYON JONES, a.k.a. "Brian Simms", ELLIOTT BERRY BROWN, a.k.a. "L", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, MICHAEL MOSELY, DARRYL JAMES and others, and that, LEON ALFRED SMITH, Jr., DAVID BARNETT, a.k.a. "Dawoo", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", GEORGE KINGSTON, a.k.a. "G", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", ELLIOTT BERRY BROWN, a.k.a. "L", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, MICHAEL MOSELY, DARRYL JAMES and others would distribute various quantities of drugs to others.

It was further part of this unlawful conspiracy that while residing in California, Georgia, Tennessee, and Michigan, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony

Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B" and others used various methods of delivery in order to supply the Cocaine. During different portions of the conspiracy, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B, SHANNON NEAL LEE, a.k.a. "Darryl Rapley", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", MICHAEL MOSELY and others would travel to and from, California, Georgia, Pennsylvania, West Virginia, Tennessee and Michigan acting as couriers of the drugs and the proceeds derived from the sale and distribution of the drugs. Further, ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, KYLE STEVENS, and others would store the drugs at various locations after they were transported to the Georgia, Pennsylvania, West Virginia, Tennessee and Michigan area. Additionally, the drugs would then be transported to various other locations within the Georgia, Pennsylvania, West Virginia, Tennessee and Michigan area.

It was further part of the ways and means of this unlawful conspiracy that various vehicles would be modified to create compartments in order to hide the drugs and the proceeds while the drugs and proceeds were being transported across the United States. Further, in order to reduce the chance of detection by law enforcement, the members of the conspiracy encased the cocaine and proceeds for the sale of the cocaine in wax candles and plastic resins for transportation.

It was further part of the ways and means of the unlawful conspiracy that RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", DAVID BARNETT, a.k.a. "Dawoo", ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", TOI HORN, BRYON JONES, a.k.a. "Brian Simms", JULIA A. CARTER, a.k.a.

"Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, QUIANNA STARR WASLER, a.k.a. "Kiki", MICHAEL MOSELY, and others would set up and run various business fronts in Michigan, California, Tennessee, and ST. Lucia. The intended purpose of these various business fronts was to hide the movement of drugs and drug proceeds at the "business" in an attempt hide the true source of the drug proceeds and to try to provide a "legitimate" explanation for the money generated as a result of their drug trafficking.

It was further part of the ways and means of the conspiracy for RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", TOI HORN, BRYON JONES, a.k.a. "Brian Simms", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", DARNELL JACKSON, a.k.a. "Bruce Stewart", a.k.a. "The Chemist and others to use false names, social security numbers, and birth certificates to disguise and to conceal their identities in financial transactions which were conducted to promote their drug trafficking.

Additionally, it was part of the ways and means of the unlawful conspiracy for RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", DAVID BARNETT, a.k.a. "Dawoo", GEORGE KINGSTON a.k.a. "G", and others to use the threat of violence, violence and deadly force to insure protection of the drugs and drug proceeds, prevent loss of the exclusive right to the distribution of drugs in particular locations, insure non-cooperation with law enforcement and to retaliate against those who stole drugs.

It was further part of the ways and means of the unlawful conspiracy that various members

of the conspiracy would provide false and fraudulent testimony in order to protect and assure the ongoing nature of the cocaine distribution and money laundering activities, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

(Title 21, U.S.C. §848 - Continuing
Criminal Enterprise)

D-1 RILEY TROY GRAHAM,
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B",

That from on or about the year 1991, said date(s) being approximate, and continuing thereafter up to and including the year of 1998, in the Eastern District of Michigan, Southern Division, and elsewhere, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", defendant herein, did knowingly, intentionally and unlawfully engage in a continuing criminal enterprise in that he knowingly, intentionally and unlawfully did violate Title 21, United States Code Section 841 (a) and 846 on three or more occasions including but not limited to the violations set forth more completely in Counts 1 and 3 of this indictment, which counts are hereby adopted and incorporated by reference as if set out fully. These and other violations were all part of a continuing series of violations of Subchapter I and II of Title 21, United States Code Section 801 et seq., that were undertaken by defendant RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", in concert with at least five or more other persons, with respect to whom the defendant occupied the position of organizer, supervisor, and manager. Other violations include instances wherein RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix",

a.k.a. "Bruiser", a.k.a. "B" arranged for the delivery of cocaine to distributors and couriers in California, Tennessee, and Georgia who then transported the cocaine to Michigan, Tennessee, Pennsylvania, West Virginia, Georgia and elsewhere for distribution. These other violations took place on or about April 7, 1992, April 16, 1992, September 19, 1992, April 4, 1995, October 18, 1995, March 19, 1998 and March 20, 1998. From the continuing series of violations defendant RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B" obtained substantial income and resources all, in violation of Title 21, United States Code Section 848 (a)(c).

COUNT THREE

(Title 21, U.S.C. §841(a)(1) - Attempt Possession
with Intent to Cocaine)

- D-1 RILEY TROY GRAHAM,
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B"
- D-4 JULIA CARTER,
a.k.a. "Albertha Kelly"
a.k.a. "Jules"
- D-16 KYLE STEVENS,

On or about December 6, 1995, in the Eastern District of Michigan, Southern Division, and elsewhere, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", JULIA CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules" and KYLE STEVENS, defendants herein, did aid, abet, counsel, command, procure and induce one another and others to knowingly, intentionally, and unlawfully attempt to possess with intent to distribute approximately 980 grams or more of a mixture or substance containing a detectable

amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2.

COUNT FOUR

(Title 18, U.S.C. §1513 - Retaliation Against a Witness)

D-1 RILEY TROY GRAHAM,
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B"

On or about November 15, 2000, in the Eastern District of Michigan, Southern Division, and elsewhere, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", did knowingly, intentionally, and unlawfully attempt to kill Lawrence Richmond with the intent to retaliate against him for providing information to a law enforcement officer relating to the commission of Federal offenses in violation of Title 18, United States Code, Sections 1513.

COUNT FIVE

(Title 18 U.S.C. §§ 1956 - Money
Laundering Conspiracy)

- D-1 RILEY TROY GRAHAM,
a.k.a. "Troy Byrd Williams",
a.k.a. "Anthony Montrell Pennix",
a.k.a. "Bruiser",
a.k.a. "B",
- D-2 LEON ALFRED SMITH, Jr.,
- D-3 DAVID BARNETT
a.k.a. "Dawoo",
- D-4 SHANNON NEAL LEE,
a.k.a. "Darrly Rapley",
- D-5 OZRO GRAHAM,
a.k.a. "Rashawn Martin"
a.k.a. "Booby"
- D-6 GEORGE KINGSTON,
a.k.a. "G",
- D-7 DENNIS W. WILLIAMS, Jr.,
a.k.a. "William Hunter",
a.k.a. "Uncle",
- D-8 ALICIA NEWSOME,
a.k.a. "Dawneik Talley",
a.k.a. "Alicia Jackson",
- D-9 TOI HORN,
- D-10 BRYON JONES,
a.k.a. "Brian Simms",
- D-11 ELLIOTT BERRY BROWN,
a.k.a. "L"
- D-12 JULIA A. CARTER,
a.k.a. "Albertha Kelly",
a.k.a. "Jules",
- D-13 KELLY N. TERRELL,
- D-14 QUIANNA STARR WASLER,
a.k.a. "Kiki",
- D-15 MICHAEL MOSELY,
- D-16 DARRYL JAMES,
- D-17 DARNELL JACKSON,
a.k.a. "Bruce Stewart",
a.k.a. "The Chemist",
- D-18 KYLE STEVENS,

D-19 ALTHEA MARIE WILLIAMS,
a.k.a. "Althea M. Mckinzie",
a.k.a. "Mikki Mckinzie",
a.k.a. "Andrea Jacobs",
a.k.a. "Mikki"

That from on or about 1993, and continuing thereafter up to and including 1998, said dates being approximate, in the Eastern District of Michigan, Southern Division, and elsewhere, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", LEON ALFRED SMITH, Jr., DAVID BARNETT, a.k.a. "Dawoo", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", GEORGE KINGSTON, a.k.a. "G", DENNIS W. WILLIAMS, Jr., a.k.a. "William Hunter", a.k.a. "Uncle", ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", TOI HORN, BRYON JONES, a.k.a. "Brian Simms", ELLIOTT BERRY BROWN, a.k.a. "L", JULIA A. CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", KELLY N. TERRELL, QUIANNA STARR WASLER, a.k.a. "Kiki", MICHAEL MOSELY, DARRYL JAMES, DARNELL JACKSON, a.k.a. "Bruce Stewart", a.k.a. "The Chemist", KYLE STEVENS, and ALTHEA MARIE WILLIAMS, a.k.a. "Althea M. Mckinzie", a.k.a. "Mikki Mckinzie", a.k.a. "Andrea Jacobs", a.k.a. "Mikki" defendants herein, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with each other and with various other persons whose names are both known and unknown to the Grand Jury to commit offenses against the United States, that is to engage in money laundering; more specifically, they conspired knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, and did conduct and attempt to conduct financial transactions with the intent to promote the carrying on of specified unlawful activity and with the intent to conceal and disguise the source, ownership and control of the proceeds of specified unlawful

activity, to wit: a conspiracy to illegally distribute cocaine and the illegal distribution of cocaine; all in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I), (B)(I), and (h).

It was part of the ways and means of this unlawful conspiracy for RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", DAVID BARNETT a.k.a. "Dawoo" and others, both known and unknown to the grand jury, to engage in various schemes designed to conceal and disguise the source of the proceeds and to promote the carrying on of the Cocaine distribution. During the pendency of this conspiracy, RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", DAVID BARNETT a.k.a. "Dawoo" and others created clothing store businesses in the Detroit, Michigan area and Beverly Hills, California area that were called the Nine Mile Partnership, T Clothing Company, Active Wear Company, Bonnets Men and Women's Boutique, and Barnett International Freight Forwarding Company. Additionally, RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", JULIA CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", BRYON JONES, a.k.a. "Brian Simms", and others created a mail-drop business in Beverly Hills, California that was called the Business and Postal Center. Similarly, RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", JULIA CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", and others created a record business in Georgia, that was called Rian Records. Later, RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", TOI HORN, QUIANNA WASLER, a.k.a. "Kiki" and others created trucking businesses in Nashville, Tennessee and Detroit, Michigan that were called the Unique Express Freight Company and Pennix Leasing. Additionally, RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser",

a.k.a. "B" and others created property development companies called Paragon Construction Management Services, and Genesis Limited. These business were primarily shell companies that were established by the members of the conspiracy to promote their cocaine trafficking by disguising and concealing the interstate transportation of multi-kilograms of cocaine sent in packages by air express, or in concealed compartments inside an 18-wheeler truck, from California to Michigan and Tennessee. Further, these businesses were used to disguise and conceal the transfer of the cocaine proceeds from Michigan and Tennessee to California by the same methods, in order to pay for the purchase of more kilograms of cocaine and to promote the on-going cocaine distribution. Additionally, the members of the conspiracy would assert the existence of these various business enterprises and schemes in an attempt to explain a legitimate source for their drug income, to obtain assets by false and fraudulent means and to invest their drug proceeds.

It was further part of the way and means of this unlawful conspiracy for RILEY TROY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B", DAVID BARNETT a.k.a. "Dawoo", ELLIOTT BERRY BROWN, a.k.a. "L", a.k.a. "El", JULIA CARTER, a.k.a. "Albertha Kelly", a.k.a. "Jules", OZRO GRAHAM, a.k.a. "Rashawn Martin", a.k.a. "Booby", GEORGE KINGSTON, a.k.a. "G", MICHAEL MOSELY, ALICIA NEWSOME, a.k.a. "Dawneik Talley", a.k.a. "Alicia Jackson", TOI HORN, BRYON JONES, a.k.a. "Brian Simms", LEON ALFRED SMITH,, KELLY N. TERRELL, QUIANNA WASLER, a.k.a. "Kiki", SHANNON NEAL LEE, a.k.a. "Darryl Rapley", DARNELL JACKSON, a.k.a. "Bruce Stewart", a.k.a. "The Chemist", KYLE STEVENS and others to wire transfer large amounts of drug proceeds (via Western Union Wire Transfer Services) to and from Michigan, California, Tennessee, Georgia and Saint Lucia, West Indies for the purpose of promoting the on-going drug distribution

activities. The members of the conspiracy would use numerous individuals to wire transfer the drug proceeds primarily from Michigan and Tennessee to California where members of the conspiracy would pick up the money at Western Union offices. Additionally, rather than have a large amount of money sent to California in one Western Union wire transfer, the members of the conspiracy and others would be instructed to break the money transfers into smaller amounts of \$1,000 to \$5,000 in order to minimize any suspicions of the Western Union employees and to avoid Western Union employees from filing currency transaction reports with the government.

It was further part of the ways and means of this unlawful conspiracy for RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B" and others to obtain vehicles, property and other assets in fraudulent and false identities with drug proceeds in order to conceal and disguise the ownership and the source of the illegal proceeds and to promote the on-going nature of their drug trafficking. ALTHEA MARIE WILLIAMS, a.k.a. "Althea M. McKinzie", a.k.a. "Mikki McKinzie", a.k.a. "Andrea Jacobs", a.k.a. "Mikki", obtained and provided the members of the conspiracy with various items of false and fraudulent identification that aided the members of the conspiracy in concealing and disguising the ownership and the source of the illegal proceeds and promoted the on-going nature of their drug trafficking. Further, ALTHEA MARIE WILLIAMS, a.k.a. "Althea M. McKinzie", a.k.a. "Mikki McKinzie", a.k.a. "Andrea Jacobs", a.k.a. "Mikki" provided false information and employment verification to people who called to check on information provided by various members of the conspiracy.


It was further part of the ways and means of this unlawful conspiracy for RILEY GRAHAM, a.k.a. "Troy Byrd Williams", a.k.a. "Anthony Montrell Pennix", a.k.a. "Bruiser", a.k.a. "B" and others to transport and to wire transfer large quantities of drug proceeds to an individual in Saint

Lucia, West Indies, in an effort to build and develop the first casino resort on the island of Saint Lucia, in order to conceal and disguise the ownership and the source of the illegal proceeds, all in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I), (B)(I), and (h).

THIS IS A TRUE BILL


FOREPERSON

SAUL A. GREEN
United States Attorney


RONALD W. WATERSTREET
Assistant United States Attorney

Dated: November 16, 2000